

1 **VICTOR N. PIPPINS**
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6 Attorneys for Mr. Rodriguez-Acosta
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11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA
13 (HONORABLE IRMA E. GONZALEZ)

14 UNITED STATES OF AMERICA,) Case No.: 08CR0878-IEG
15 Plaintiff,)
16 v.) Date: April 28, 2008
17 MIGUEL RODRIGUEZ-ACOSTA,) Time: 2:00 p.m.
18 Defendant.)
19 _____)
20 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
21 PETER MAZZA, ASSISTANT UNITED STATES ATTORNEY:
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23 PLEASE TAKE NOTICE that, on April 28, 2008, at 2:00 p.m., or as soon thereafter as counsel
24 may be heard, the accused, Miguel Rodriguez-Acosta, by and through his attorneys, Victor Pippins and
25 Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions outlined
26 below.
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**(1) COMPEL DISCOVERY;
(2) PRESERVE AND INSPECT EVIDENCE;
(3) GRANT LEAVE TO FILE FURTHER MOTIONS**

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2 **MOTIONS**

3 Defendant, Mr. Rodriguez-Acosta, by and through his attorneys, Victor Pippins and
4 Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of
5 Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for
6 an order to:

- 7 (1) Compel Discovery; and
8 (4) Preserve and Inspect Evidence; and
9 (5) Grant Leave to File Further Motions.

10 These motions are based upon the instant motions and notice of motions, the attached statement of
11 facts and memorandum of points and authorities, and any and all other materials that may come to this
12 Court's attention at or before the time of the hearing on these motions.

13 Respectfully submitted,

14 DATED: April 18, 2008

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16 */s/ Victor N. Pippins*
17 **VICTOR N. PIPPINS**
18 Federal Defenders of San Diego, Inc.
19 Attorneys for Mr. Rodriguez-Acosta
20 E-mail: victor_pippins@fd.org

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE IRMA E. GONZALEZ)

UNITED STATES OF AMERICA,) Case No.: 08CR0878-IEG
Plaintiff,)
v.)
MIGUEL RODRIGUEZ-ACOSTA,)
Defendant.)
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CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of his information and belief, and that a copy of the foregoing document has been served this day upon:

Peter J Mazza
peter.mazza@usdoj.gov,lilian.ruiz@usdoj.gov,efile.dkt.gc1@usdoj.gov

Respectfully submitted,

DATED: April 18, 2008

/s/ Victor N. Pippins

VICTOR N. PIPPINS

Federal Defenders of San Diego, Inc.

Attorneys for Defendant